

Response to Comments Received
Radioactive Materials Transportation: Basic Facts for Local Governments
(LGN Presentation)
(Please Note: Sequence of slides has changed to incorporate comments.)

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
Council of State Governments Midwestern High-Level Radioactive Waste Committee	<u>GENERAL COMMENTS</u>	
	It is important to understand whom the audience and the presenter will be. If the presenter is not a DOE representative, how will the person know how to explain things such as the Motor Carrier Evaluation Program or the fact that Type A and Type B packages are not required to undergo actual testing? If, indeed, the presentation is intended to be delivered by a local government official, then the content should be much more general.	Comment incorporated.
	An overview page showing all the upcoming topics would be a useful addition.	Comment incorporated.
	Will there be special slides available to describe specific shipping campaigns?	Perhaps at a later date.
	What about including a customized slide or two showing state points of contact?	Blank slide inserted in presentation. Local officials can fill in appropriate information.
	There is no mention of routing in the presentation. Local governments will probably want to know how routes are chosen for shipments.	Routing added to presentation.

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<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>----</p> <p>Oregon Department of Energy</p> <p>-----</p> <p>----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p>The distinction between DOE Orders and NRC regulations needs to be clarified. From the presentation as written, one would assume that the NRC regulates all of DOE's transportation activities.</p> <p>-----</p> <p>-----</p> <p>For the most part, the Local Government Network Presentation accurately and thoroughly covers those areas which should be covered in a presentation such as this.</p> <p>-----</p> <p>-----</p> <p>Use "Radioactive Materials" (not "Radioactive Material").</p> <p>Use "Transporting Radioactive Materials" (not Radioactive Materials Transportation").</p> <p>Use "The U.S. DOE" (not "DOE").</p> <p>Consider using "U.S. DOT" (not "DOT") for U.S. Department of Transportation.</p> <p>Format URLs consistently (http:// and final slash).</p> <p>Accident v. incident.</p>	<p>Comment incorporated.</p> <p>-----</p> <p>-----</p> <p>No response required.</p> <p>-----</p> <p>-----</p> <p>Comment incorporated.</p> <p>Comment not incorporated. Wording used is standard DOE phrasing.</p> <p>Comment not incorporated.</p> <p>Comment not incorporated.</p> <p>Changed format to delete "http".</p> <p>NTP's <i>Glossary of Transportation/Packaging Terms</i> defines accident and incident in very similar terms. Reference 49 CFR 107.3, 171.15, 171.16, 225.5 and 390.5. CFR 49 171.15 refers to an occurrence as a reportable "incident" when death, serious injury or</p>

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Transportation Resource Exchange Center (T-REX), University of New Mexico	Federal, state, tribal are adjectives and should not be capitalized.	property damage in excess of \$50K results directly from hazardous materials or as a result of suspected radioactive contamination. Reference GPO rule 3.19.
Transportation Resource Exchange Center (T-REX), University of New Mexico	<u>SLIDE NO. 1</u> Title is Awkward. Use “Transporting Radioactive Materials” (or “Transportation of Radioactive Materials”). Insert URL for DOE National Transportation Program on the introductory slide.	Comment not incorporated. Presentation targets local governments with the basic facts. Comment not incorporated. URL is given later in the presentation.
Council of State Governments Midwestern High-Level Radioactive Waste Committee ----- ----- Transportation Resource Exchange Center (T-REX), University of New Mexico	<u>SLIDE NO. 3</u> Spell out “Department of Energy” and provide the acronym on this page (putting it on the cover page isn’t sufficient). ----- ----- 1 st sentence suggestion: “Several kinds of hazardous materials, including radioactive materials, are shipped every day.” Change “DOE” to “The U.S. DOE”.	Comment incorporated. ----- ----- Comment not incorporated. Focus is on radioactive materials.

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	Change “radioactive materials transportation” to “transporting radioactive materials”.	Comment not incorporated. Comment not incorporated. Standard DOE phrasing used.
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>----</p> <p>Oregon Department of Energy</p> <p>-----</p> <p>----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p><u>SLIDE NO. 4</u></p> <p>Delete the parenthetical references after “National Nuclear Security Administration.” (If people do not know what NNSA is, chances are they will not recognize the other offices, either.)</p> <p>-----</p> <p>-----</p> <p>This is more detail than is needed. I suggest deleting this page.</p> <p>-----</p> <p>-----</p> <p>Change “DOE” to “The U.S. DOE”.</p> <p>-----</p> <p>Change “radioactive materials shipments” to “transporting radioactive materials” (or “shipping radioactive materials”).</p> <p>Insert comma after “Science” in Nuclear Energy, Science and Technology.</p> <p>Insert “NTP” in parentheses after EM.</p>	<p>Slide deleted.</p> <p>-----</p> <p>-----</p> <p>Comment incorporated.</p> <p>-----</p> <p>-----</p> <p>Slide deleted.</p> <p>Slide deleted.</p> <p>Slide deleted.</p> <p>Slide deleted.</p>

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<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>Oregon Department of Energy</p> <p>-----</p> <p>-----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p><u>SLIDE NO. 5</u></p> <p>As we have commented many times before, this statistic is meaningless. It could even be construed as an attempt to confuse or distract the audience. Comparing DOE radioactive materials shipments to the universe of hazmat shipments in the U.S. is analogous to saying, “DOE is responsible for an exceedingly small fraction of all weapons and armament shipments in the U.S. Never mind that our weapons are the <i>nuclear</i> kind – we still only ship a few of them.” A more useful pie chart would show the total number of curies shipped. Better still, we suggest deleting the page from the presentation. Page 5 should include the percentage of radioactivity which DOE shipments represent on an annual basis. Otherwise, I believe this graph is misleading, and doesn’t accurately represent DOE’s impact on this issue.</p> <p>-----</p> <p>-----</p> <p>Change text to: “The U.S. DOE makes approximately five thousand of the three million shipments of radioactive materials in the U.S. each year.”</p> <p>Get rid of capitals on this slide, other slides do not have capitals.</p> <p>The text, pie graph and legend present conflicting numbers: 3 million and 300 million.</p>	<p>Comment not incorporated. Intent of slide is to provide context for local officials who deal with all radioactive materials.</p> <p>Comment not incorporated. See above response.</p> <p>-----</p> <p>-----</p> <p>Comment partially incorporated.</p> <p>Comment incorporated.</p> <p>Comment not incorporated. The 300 million on this slide indicates number of all hazmat shipments, including radioactive. The larger “slice” of the pie shows the 3 million radioactive materials shipments (refer to key).</p>

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Transportation Resource Exchange Center (T-REX), University of New Mexico	<p>Pie chart: Change to “Annual U.S. Shipments of Hazardous and Radioactive Materials (About 3 [or 300] Million”).</p> <p>Legend: Change text by yellow box: “U.S. DOE Shipments of Nonradioactive Hazardous Materials (10,999/<1%)**.”</p> <p>Legend: Change text by green box: “U.S. Shipments of Radioactive Materials (3 million)”.</p> <p>Legend: Change text by pink box: “U.S. DOE Shipments of Radioactive Materials (5....)”.</p> <p>Change footnote * text to: “Based on a U.S. Department of Transportation (DOT), Office of Hazardous Materials Safety estimate.” (This is the first usage of DOT, so needs to be spelled out).</p> <p>Change footnote ** text to: “Source: (INSERT ONLY ONE SPACE) U.S. DOE transportation activities information for FY 1999.</p>	<p>Comment incorporated.</p> <p>Comment not incorporated.</p> <p>Comment not incorporated.</p> <p>Comment not incorporated.</p> <p>Comment partially incorporated.</p> <p>Comment incorporated.</p>
Transportation Resource Exchange Center (T-REX), University of New Mexico	<p><u>SLIDE NO. 6</u></p> <p>Change “DOE ships” to “The U.S. DOE transports...”.</p> <p>One space after the colon modes: highway.</p> <p>One space after the colon Source: And change to “Source: U.S. DOE....”.</p>	<p>Comment not incorporated.</p> <p>Comment incorporated.</p> <p>Comment incorporated.</p>

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U.S. Department of Energy, Naval Nuclear Propulsion Program	<p>Insert spacing between the title text and the pictograph.</p> <p>Insert comma after water “water, and air”.</p> <p>Question: Text uses: Chart Uses: 1st highway truck 2nd rail train 3rd water water (ok) 4th air airplane</p> <p>Change the text to read: “The U.S. DOE transports hazardous and radioactive materials by all modes: airplane, truck, train, and water. Need to keep the terms consistent and the order consistent in the text and the chart.</p> <p>Delete shipment statistics on other hazardous materials. Why? Focus pitch on RAM and don’t confuse with other hazmat info.</p>	<p>Comment incorporated.</p> <p>Comment not incorporated.</p> <p>Comment incorporated.</p> <p>Comment partially incorporated.</p> <p>Comment not incorporated. Intent is to compare radioactive materials shipments with other DOE shipment types.</p>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>----</p> <p>Transportation Resource</p>	<p><u>SLIDE NO. 7</u></p> <p>Spell out “Department of Transportation” and provide the acronym on this page. There is no need to compare radioactive materials shipments to nonradioactive hazardous materials shipments – the second bullet adequately describes what a typical radmat shipment will <i>not</i> do.</p> <p>-----</p> <p>-----</p> <p>Change “DOT” to “The U.S. Department of Transportation (DOT) regulates the transporting of radioactive materials and</p>	<p>Slide 7 incorporated into slide 16.</p> <p>-----</p> <p>-----</p> <p>Slide 7 incorporated into slide 16,</p>

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University of New Mexico ----- ----- U.S. Department of Energy, Naval Nuclear Propulsion Program ----- ----- U.S. Department of Energy, Office of Transportation	----- ----- Delete the slide. Why? See Slide 6 comment. ----- ----- ----- You might want to include the number of shipments to tie back to the bar chart on page 6.	----- ----- Slide deleted. ----- ----- ----- Slide deleted.
Council of State Governments Midwestern High-Level Radioactive Waste Committee Transportation Resource Exchange Center (T-REX), University of New Mexico ----- ----- U.S. Department of Energy, Office of Transportation	<u>SLIDE NO. 9</u> This pie chart is of questionable value. Will a non-DOE presenter be able to explain RAM NOS and HRCQ? It might be better to show the relative percentages of shipments by waste type (divided into LLW, TRU, SF/HLW) and product (isotopes). Another option would be to delete this page. Change to: “FY 1999 U.S. DOE Shipments of Radioactive Materials (RAM)”. RE: The four sentences in the footnote beginning with RAM. These need to be clarified/defined or deleted. ----- ----- You might want to include the number of shipments to tie back to the bar chart on page 6.	Comment partially incorporated. Footnote has been deleted. Comment not incorporated. Footnote has been deleted. ----- ----- Comment not incorporated. Too much detail. Purpose of presentation is to provide basic facts.
	<u>SLIDE NO. 10</u>	

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<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>----</p> <p>Oregon Department of Energy</p> <p>-----</p> <p>----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p>Is it possible to customize this map to show the national map, with a specific state or tribe enlarged to show more detail?</p> <p>-----</p> <p>-----</p> <p>The lines for truck and HRCQ are not distinctive enough to be able to tell which is which (perhaps it would in color, but my copy is in black and white, and you should assume that's how others will view these as handouts).</p> <p>-----</p> <p>-----</p> <p>Add spacing between slide title and map.</p> <p>Change to: "Major FY 1999 U.S. DOE Routes for Transporting Radioactive Materials".</p> <p>Legend colors and map route colors do not correspond.</p>	<p>Comment not incorporated. Too much detail.</p> <p>-----</p> <p>-----</p> <p>Comment incorporated.</p> <p>-----</p> <p>-----</p> <p>Comment not incorporated.</p> <p>Comment not incorporated. Title changed. These are typical routes. Not ALL routes are shown.</p> <p>Map changed to black and white.</p>
<p>Oregon Department of Energy</p> <p>-----</p> <p>----</p> <p>Transportation Resource</p>	<p><u>SLIDE NO. 12</u></p> <p>I would delete two or three of the lesser items from this list of bullets. There is more here than is necessary.</p> <p>-----</p> <p>-----</p> <p>Change to: "The U.S. DOE transports radioactive materials</p>	<p>Comment incorporated.</p> <p>-----</p> <p>-----</p> <p>Comment not incorporated. Phrase was reworted,</p>

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Exchange Center (T-REX), University of New Mexico	<p>safely by complying with U.S. and international regulations concerning.”</p> <p>Will blocking, bracing, segregation, etc., be verbally explained? Segregation should be “segregating”.</p> <p>Everything in the bullets should be ***** ing.</p> <p>Bullets should be in parallel structure:</p> <ul style="list-style-type: none"> • Packaging • Blocking, bracing, spacing, and segregating • Classifying • Preparing for and responding to emergencies • Marking, labeling, and documenting • Providing physical security, when applicable • Prenotifying • Routing • Training [driver training?] • Maintaining vehicles <p>Do not capitalize the adjective “federal”.</p>	<p>however.</p> <p>This line of text was removed from slide.</p> <p>Comment not incorporated. Standard DOE wording was used. See above response.</p> <p>Comment not incorporated. Followed <i>GPO Style Manual</i>.</p>
U.S. Department of Energy, Naval Nuclear Propulsion Program	<p>Delete “Classification”. Why? Classification is reflected in packaging and marking/labeling/placarding/ documenting, which are already mentioned.</p>	<p>Comment incorporated.</p>

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	<p>Delete “Routing”. Why? Routing is not a shipper responsibility.</p> <p>Delete “Vehicle Maintenance” and replace with “Use of highly-qualified carriers”. Why? Vehicle maintenance is not a shipper responsibility.</p> <p>-----</p> <p>----</p> <p>U.S. Department of Energy, Office of Transportation</p>	<p>Comment not incorporated. Shippers do have a routing responsibility. The words “and its contractors” were added at the beginning of the slide (after “DOE”).</p> <p>Comment partially incorporated.</p> <p>-----</p> <p>-----</p> <p>Reordered by sequence.</p>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>Transportation Resource Exchange Center (T-REX),</p>	<p><u>SLIDE NO. 13</u></p> <p>Rather than leaving it up to the audience to search the entire CFR for regulations pertaining to radioactive materials transportation, the presentation should list the major chapters/sections.</p> <p>The pertinent DOE orders should also be listed (with a link provided), since some shipments are not regulated by the NRC.</p> <p>Change to: “The U.S. DOE...”</p> <p>Indent the Web address.</p>	<p>Comment not incorporated. Too detailed.</p> <p>Comment not incorporated. Too detailed.</p> <p>Comment not incorporated. Style preference.</p>

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University of New Mexico	<p>Change “data base” to “database” (1 word).</p> <p>Add colon after available.</p>	<p>Text moved to end of presentation.</p> <p>Text deleted.</p> <p>Text deleted.</p>
<p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>-----</p> <p>-----</p> <p>U.S. Department of Energy, Office of Transportation</p>	<p><u>SLIDE NO. 14</u></p> <p>Change to: “The U.S. Department of Transportation (DOT) and the U.S. Nuclear Regulatory Commission (NRC) share the primary responsibility for regulating the transportation of radioactive materials.”</p> <p>-----</p> <p>-----</p> <p>Will the presenter be able to provide a quick overview of what each agency does/has responsibility for (regulatory overview)? If not, you may need to add.</p>	<p>Slide deleted.</p> <p>-----</p> <p>-----</p> <p>Slide deleted.</p>
Nuclear Waste Technical Review Board	<p><u>SLIDE NO. 15</u></p> <p>VG 15 says that IAEA governs international shipments. I don’t think that is correct. The IAEA regs are the model for national regulations which actually govern shipments by truck rail and barge. The modal regulations for sea and air transport that appear on the slide are also based on IAEA regulations and cover shipments that are in international space or in areas not governed by the national regulations of the shipper or consignee.</p>	<p>Slide deleted, information moved to end of presentation. Comment partially incorporated.</p>

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<p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>-----</p> <p>----</p> <p>U.S. Department of Energy, Naval Nuclear Propulsion Program</p> <p>-----</p> <p>----</p> <p>U.S. Department of Energy, Office of Transportation</p>	<p>Change dashes to bullets and format URLs as on page 14.</p> <p>-----</p> <p>-----</p> <p>Delete the slide. Why? No need to talk to international shipments in a local government pitch.</p> <p>-----</p> <p>-----</p> <p>Will the presenter be able to provide a quick overview of what each agency does/has responsibility for (regulatory overview)? If not, you may need to add.</p>	<p>Slides 13 through 15 deleted and information moved to end of presentation.</p> <p>-----</p> <p>-----</p> <p>Slides 13 through 15 deleted and information moved to end of presentation. International standards included as part of complete list of safety regulatory sites.</p> <p>-----</p> <p>-----</p> <p>New slide added to cover DOT/NRC/DOE responsibilities.</p>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p><u>SLIDE NO. 16</u></p> <p>Change the last bullet to read: "... radioactive materials can be shipped in a manner that is safe for the public and the environment." (Shipments are not made for the public or the environment.)</p> <p>-----</p> <p>-----</p> <p>Change to: "The U.S. DOE follows DOT and NRC requirements for the safe transportation of radioactive materials."</p> <p>1st bullet: Change to "The U.S. DOE"</p> <p>2nd bullet: Change to: "State, tribal, and local safety specialists</p>	<p>Comment incorporated.</p> <p>-----</p> <p>-----</p> <p>Header was changed.</p> <p>Comment not incorporated. Style preference.</p> <p>Comment partially incorporated.</p>

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Transportation Resource Exchange Center (T-REX), University of New Mexico	<p>have scrutinized the U.S. DOE’s shipments of radioactive materials more thoroughly than any other shipments of hazardous materials.”</p> <p>3rd bullet: Change to: “When radioactive materials are packaged (contained) and transported in accordance with the regulations, they pose no threat to the public or to the environment.”</p>	See response to similar comment above.
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>-----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p><u>SLIDE NO. 17</u></p> <p>Should be dropped unless the presenter will be a DOE representative.</p> <p>-----</p> <p>-----</p> <p>Change to: “The U.S. DOE’s Motor Carrier Evaluation Program (MCEP) helps the U.S. DOE and its contractors select highly qualified carriers.”</p> <p>NOTE: No hyphen between highly (an adverb) and qualified (an adjective).</p> <p>Bullet: Change “onsite” to “On-site” (compound adjective).</p> <p>1st dash: “Years of experience (verified) in transporting hazardous materials”.</p>	<p>Slide replaced.</p> <p>-----</p> <p>-----</p> <p>Comment partially incorporated in new slide.</p> <p>Comment incorporated.</p> <p>Comment not incorporated. Reference GPO rule 7.</p> <p>Text deleted from new slide.</p>

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<p>-----</p> <p>----</p> <p>U.S. Department of Energy, Naval Nuclear Propulsion Program</p> <p>U.S. Department of Energy, Office of Transportation</p>	<p>4th dash: Add “and radioactive” between “hazardous” and “materials” IF this is true.</p> <p>-----</p> <p>-----</p> <p>Add bullet that reads “ – Vehicle maintenance”. Why? Vehicle maintenance is critical to determining a high quality carrier.</p> <p>You may want Brian H. (DOE National Transportation Program, Albuquerque) to take a look at this – I know they are making changes to the program.</p>	<p>Text deleted from new slide.</p> <p>-----</p> <p>-----</p> <p>Slide replaced.</p> <p>Comment incorporated. Slide replaced.</p>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>----</p> <p>Oregon Department of Energy</p> <p>-----</p> <p>----</p> <p>Transportation Resource Exchange Center (T-REX),</p>	<p><u>SLIDE NO. 18</u></p> <p>Should be dropped unless the presenter will be a DOE representative.</p> <p>-----</p> <p>-----</p> <p>Contains too much information. I suggest deleting the three sub-bullets on this page.</p> <p>Also, the last bullet is not very clear as to its meaning or importance.</p> <p>-----</p> <p>-----</p> <p>1st bullet: Change to “Coordination with the DOT’s carrier reviews”.</p>	<p>Slide replaced.</p> <p>-----</p> <p>-----</p> <p>Slide replaced.</p> <p>-----</p> <p>-----</p> <p>Slide replaced.</p>

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<p>University of New Mexico</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>-----</p> <p>-----</p> <p>U.S. Department of Energy, Office of Transportation</p>	<p>1st dash: Change to: “Incorporates information provided by previous MCEP evaluations.”</p> <p>2nd dash: Change to: Adds key elements of the DOT’s Motor...”</p> <p>2nd dash: After “minimum,” add “U.S.”</p> <p>2nd bullet: For parallel structure, change to “Completion of monitoring process twice a year”.</p> <p>3rd bullet: Change “carrier” to “carriers”.</p> <p>-----</p> <p>-----</p> <p>You may want Brian H. (DOE National Transportation Program, Albuquerque) to take a look at this – I know they are making changes to the program.</p>	<p>Slide replaced.</p> <p>Slide replaced.</p> <p>Slide replaced.</p> <p>Slide replaced.</p> <p>Slide replaced.</p> <p>-----</p> <p>-----</p> <p>Comment incorporated. Slide replaced.</p>
<p>Nuclear Waste Technical Review Board</p> <p>-----</p>	<p><u>SLIDE NO. 19</u></p> <p>VG 19 says that Type A packages are for things that require shielding. While that’s mostly true, its not the only justification for Type A packaging. Quantities of isotopes that have no significant radiation field are required to be shipped in Type A packages because they exceed limits for lower quality packaging.</p> <p>-----</p>	<p>Comment incorporated.</p> <p>-----</p>

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<p>-----</p> <p>Oregon Department of Energy</p> <p>-----</p> <p>-----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>-----</p> <p>-----</p> <p>U.S. Department of Energy, Naval Nuclear Propulsion Program</p> <p>-----</p> <p>U.S. Department of Energy, Office of Transportation</p>	<p>-----</p> <p>The mention of “shielding” in the bullet about Type A packaging may lead some to believe that lead or steel shielding is a common and important element of Type A packages.</p> <p>-----</p> <p>-----</p> <p>Change to: “In transporting radioactive materials safely, packaging is the first line of defense.”</p> <p>-----</p> <p>-----</p> <p>Delete “Type A packaging” discussion and replace with “Strong-Tight Packaging” discussion from Slide 21 and place “Strong-Tight Packaging” between “Excepted Packaging” and “Industrial Packaging”. Why? Clarification and formatting. Move the Strong-Tight Packaging from page 21 to page 19. This should be the first type of packaging discussed.</p>	<p>-----</p> <p>Comment partially incorporated. Strong-tight moved forward in presentation. Changed “shielding” to “protection”.</p> <p>-----</p> <p>-----</p> <p>-----</p> <p>Comment not incorporated. “Packaging” is the key word.</p> <p>-----</p> <p>-----</p> <p>Comment partially incorporated.</p> <p>-----</p> <p>Comment partially incorporated.</p>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>-----</p> <p>Oregon Department of Energy</p>	<p><u>SLIDE NO. 20</u></p> <p>“Designs” should be emphasized on this page and on p. 22. The pages showing testing of Type A and Type B containers should be grouped together.</p> <p>-----</p> <p>-----</p> <p>Move Strong-tight packaging to the appropriate place on page 19, so that it comes in order of strength of packaging.</p>	<p>Header reworded – see DOE/Naval Nuclear Propulsion comment that follows.</p> <p>-----</p> <p>-----</p> <p>Comment incorporated.</p>

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	<p>Otherwise, some might believe it is supposed to be more rugged than a Type B package.</p> <p>Re-order the information, and make a slight edit in the bullet on Type B packaging, so that it reads: “Type B Packaging – for materials with high radioactive levels (spent nuclear fuel, cobalt sources, etc.) that need packaging to retain the contents under both normal transport conditions and severe accident conditions.”</p>	<p>Comment incorporated.</p>
<p>-----</p> <p>-----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>-----</p>	<p>-----</p> <p>Change to: “Type A packaging designs must undergo real-life, physical prescribed tests, not merely computer simulations or other theoretical tests.”</p> <p>Is there a CFR citation for these?</p> <p>-----</p>	<p>-----</p> <p>See response to DOE/Naval Nuclear Propulsion comment below.</p> <p>Not necessary to cite it here.</p> <p>-----</p>
<p>-----</p> <p>U.S. Department of Energy, Naval Nuclear Propulsion Program</p> <p>U.S. Department of Energy, Naval Nuclear Propulsion Program</p> <p>-----</p> <p>-----</p> <p>U.S. Department of Energy, Office of Transportation</p>	<p>-----</p> <p>Make this slide 21, changing the heading to read “Type A packaging must meet prescribed normal transport performance standards.” Why? Clarification/formatting, avoid connotation that every package is tested.</p> <p>New slide 20 should be the “Type A Packaging” discussion from slide 19 and the “Type B Packaging” discussion from Slide 21. Why? Clarification and formatting.</p> <p>-----</p> <p>-----</p> <p>Suggest changing title to “Type A packaging designs must meet prescribed test requirements.”</p>	<p>-----</p> <p>Comment incorporated.</p> <p>Comment incorporated.</p> <p>-----</p> <p>-----</p> <p>See DOE/Naval Nuclear Propulsion comment above.</p>
	<u>SLIDE NO. 21</u>	

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>----</p> <p>Nuclear Waste Technical Review Board</p> <p>-----</p> <p>----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>-----</p> <p>----</p> <p>U.S. Department of Energy, Office of Transportation</p>	<p>Change “radioactive” to “radioactivity” in the first bullet.</p> <p>Also, this bullet should read: “...need a packaging that can retain its contents under both normal transport conditions and hypothetical accident conditions.”</p> <p>-----</p> <p>-----</p> <p>VG 21 contains Strong and Tight packages as well as Type B. S&T’s belong earlier in the sequence, they are just another type of industrial packaging. On the same slide as Type B suggests they are more competent than Type B.</p> <p>-----</p> <p>-----</p> <p>The “N-dashes” should be changed to “M-dashes” after “Type B Packaging” and “Strong-Tight Packaging”.</p> <p>-----</p> <p>-----</p> <p>Change title to “ . . . must successfully complete . . .”</p>	<p>Comment incorporated.</p> <p>Comment not incorporated. Standard DOE wording used.</p> <p>-----</p> <p>-----</p> <p>Comment incorporated.</p> <p>-----</p> <p>-----</p> <p>Will use colons instead of “em dashes”.</p> <p>-----</p> <p>-----</p> <p>Comment not incorporated. See DOE Naval Nuclear Propulsion Program comment below.</p>
<p>U.S. Department of Energy, Naval Nuclear Propulsion Program</p>	<p><u>SLIDE NO. 22</u></p> <p>Change heading to read “Type B packaging designs must meet Type A standards PLUS severe accident standards.” Why? Clarification/formatting/avoid connotation that every package is tested.</p>	<p>Comment incorporated.</p>
	<p><u>SLIDE NO. 23</u></p>	

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p>Change “contents” to “the material’s”.</p> <p>-----</p> <p>-----</p> <p>Change to: “Conspicuous visual identification of packages and transport vehicles helps protect handlers and others who respond to emergencies.”</p> <p>RE Markings, Labels, Placards. Perhaps insert a slide to show the differences between a label and a placard and “markings”.</p> <p>3rd bullet: Change “a” to “any”.</p> <p>4th bullet: Add “the” between “about” and “contents”. Add a comma after “label”. Add a comma after “information”.</p> <p>-----</p> <p>-----</p> <p>In last bullet, revise to read “as well as emergency information such as DOE shipper contact and phone number information”. Why? To emphasize that the DOE shipper is available for consultation in the event of an accident, per the regulations.</p>	<p>Comment incorporated.</p> <p>-----</p> <p>-----</p> <p>Comment not incorporated; too complicated.</p> <p>Graphics added.</p> <p>Comment incorporated.</p> <p>Comment incorporated. Bullet was reworded. Comment not incorporated. Bullet was reworded. Comment not incorporated. Bullet was reworded.</p> <p>-----</p> <p>-----</p> <p>Bullet was reworded for clarification.</p>
<p>-----</p> <p>----</p> <p>U.S. Department of Energy, Naval Nuclear Propulsion Program</p>		
	<u>SLIDE NO. 24</u>	

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
Council of State Governments Midwestern High-Level Radioactive Waste Committee Transportation Resource Exchange Center (T-REX), University of New Mexico	<p>Insert “the” after “ensure” in the title.</p> <p>Before DOE, add “the U.S.”</p> <p>1st dash: Before “DOE,” add “The U.S.”</p> <p>Transponders: Will the audience know what these are?</p>	<p>Comment incorporated.</p> <p>Comment not incorporated.</p> <p>Comment not incorporated.</p> <p>Removed from text.</p>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p><u>SLIDE NO. 25</u></p> <p>The first bullet should indicate that the states, at their discretion, may pass information on to the locals.</p> <p>Also, mention that advance notification for spent fuel and HLW shipments is a requirement of NRC regulations and DOE Orders.</p> <p>-----</p> <p>-----</p> <p>Change to: “The U.S. DOE’s policy is”</p> <p>1st bullet: “The U.S. DOE provides state governors...” Job titles are lower case unless used with a name (Governor Johnson).</p> <p>State is not a proper noun here.</p> <p>2nd bullet: “The U.S. DOE’s policy...” Since bullet one identifies the state personnel who receives</p>	<p>Comment incorporated. Added as separate bullet.</p> <p>Comment incorporated.</p> <p>-----</p> <p>-----</p> <p>Comment not incorporated.</p> <p>Bullet was reworded.</p> <p>Comment not incorporated. Reference GPO rule 3.19.</p> <p>Bullet reworded for clarification.</p>

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
U.S. Department of Energy, Office of Transportation	notification, can a tribal entity be identified? Such as, governor or president or elder? Title: “DOE policy is to notify authorities of ‘certain’ shipments.” The protocols are pretty specific on which we notify – can you be specific here?	Explained in first bullet.
Oregon Department of Energy	<u>SLIDE NO. 26</u> Title implies that the average public is involved in transportation and shipment planning. A more appropriate title might be “State, local and tribal government involvement in Transportation/Shipment Planning.”	Comment incorporated.
----- ----- Transportation Resource Exchange Center (T-REX), University of New Mexico	----- ----- Change to: “Public Involvement in Planning the Transportation of Radioactive Materials”.	----- ----- Title changed to: State, Tribal and Local Government Involvement in Transportation/Shipment Planning.
Transportation Resource Exchange Center (T-REX), University of New Mexico	<u>SLIDE NO. 27</u> Change to: “In transporting radioactive materials, the U.S. DOE and its shipping programs cooperate with states, Tribes, and local officials.” 1 st bullet: What does the word “corporate” mean in this context? 1 st dash: Delete “is” and replace with “:” (colon) so no period is needed at end. 2 nd dash: Change to: “Representatives from national, state,	Comment not incorporated. Style preference. Wording was deleted to avoid confusion. Comment incorporated. Comment partially incorporated.

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
U.S. Department of Energy, Naval Nuclear Propulsion Program	tribal, and government organizations; industry and professional groups; U.S. DOE programs; and other interested parties (note semi-colons). Delete word “corporate” from bullet introduction. Why? Not clear what it adds.	Comment incorporated.
Council of State Governments Midwestern High-Level Radioactive Waste Committee	<u>SLIDE NO. 28</u> The first bullet should read: “Council of State Governments (Midwest and Northeast), ...” Also, delete “etc.” The second bullet under regional groups should read: “Regional Issue Identification, Advocacy, and Resolution.” The Local Government Network belongs on its own page (it is not a subset of “state regional groups”). The text should read: “DOE also coordinates with local officials and state agencies to ensure the safety of its shipments through their jurisdictions.” The states feel very strongly that DOE should not discuss training, in particular, with local governments without first contacting the appropriate state agencies.	Comment incorporated. Comment incorporated. Text was deleted. Comment partially incorporated.
----- ----- Transportation Resource Exchange Center (T-REX), University of New Mexico	----- ----- This slide should be split into two slides: one state and one local. Local audience deserves its own slide.	----- ----- Slides have been rearranged and reworded. State and Tribal information is now on same slide.

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
<p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>-----</p> <p>-----</p> <p>U.S. Department of Energy, Naval Nuclear Propulsion Program</p>	<p>Change to: “The U.S. DOE coordinates its transportation activities with regional groups. [“State Regional Groups” is not a proper noun and should not be capitalized.]</p> <p>Change dashes to:</p> <ul style="list-style-type: none"> -- Transportation planning -- Resolution of regional issues -- Special studies of interest to the U.S. DOE and states <p>For the LOCAL SLIDE:</p> <p>“The U.S. DOE also coordinates its transportation activities with local officials to ensure the safety of shipments through their jurisdictions.”</p> <p>Then bullet the items now in parentheses (as with regional groups):</p> <ul style="list-style-type: none"> -- Operational planning -- Public information -- Training <p>-----</p> <p>-----</p> <p>Change last bullet to read “DOE also works with local officials to underscore the safety of DOE shipments . . .” Why? The shipments are safe by virtue of regulatory compliance; “to sustain safety” implies that the work with local officials is required for safety.</p>	<p>Header has been reworded. Comment no longer applies.</p> <p>Text was deleted. Comment no longer applies.</p> <p>Wording changed in response to DOE Naval Nuclear Propulsion Program comment listed below.</p> <p>Text deleted from slide.</p> <p>-----</p> <p>-----</p> <p>Comment partially incorporated.</p>
<p>Council of State Governments Midwestern High-Level Radioactive</p>	<p><u>SLIDE NO. 29</u></p> <p>Delete “etc.” in the second bullet.</p>	<p>Text deleted.</p>

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
Waste Committee Transportation Resource Exchange Center (T-REX), University of New Mexico	Cite the Executive Order, DOE Order or CFR relevant to this issue.	Comment not incorporated; too much detail.
Council of State Governments Midwestern High-Level Radioactive Waste Committee	<u>SLIDE NO. 30</u> This slide seems like it would be more appropriate if placed just before slide 40.	Slide moved.
Council of State Governments Midwestern High-Level Radioactive Waste Committee ----- ----- Transportation Resource Exchange Center (T-REX), University of New Mexico	<u>SLIDE NO. 31</u> Do local government officials receive the prospective shipments module? If not, the slide should indicate how people can obtain the information. ----- ----- Change to: “The U.S. DOE is responsible for assisting states, tribal, and local...” (insert comma after states). 1 st bullet: Change to “The U.S. DOE’s....” Change end of this bullet to: “to identify future shipments of radioactive materials and their routes.” Footnote: Change to “*Source: The U.S. DOE Integrated Planning, Accountability, and Budgetary System database”. Note: ONE space after colon.	Slide deleted. ----- ----- Slide deleted. Slide deleted. Slide deleted.

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
U.S. Department of Energy, Office of Transportation	<p>Add comma after “Accountability”.</p> <p>Chart Caption: Add “U.S.”</p> <p>Chart: Leave a space between FY AND 1998 (all dates) or break into 2 lines and add centuries: FY 1998 FY 1999 etc.</p> <p>Suggest changing the bullet: “DOE’s PSM is used to identify future radioactive material shipments.”</p>	<p>Slide deleted.</p> <p>Slide deleted.</p> <p>Slide deleted.</p> <p>Slide deleted.</p>
Transportation Resource Exchange Center (T-REX), University of New Mexico	<p><u>SLIDE NO. 32</u></p> <p>Perhaps add address for TEPP head program.</p> <p>Also add the http:// to the URL for consistency.</p>	<p>Comment not incorporated.</p> <p>Comment partially incorporated. URLs made consistent.</p>
Council of State Governments Midwestern High-Level Radioactive Waste Committee	<p><u>SLIDE NO. 33</u></p> <p>The level of detail regarding the TEPP program is probably too great for a general audience with a non-DOE presenter.</p>	<p>Text simplified.</p>

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
<p>----- ----- Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p>----- ----- TEPP Mission or Purpose?</p> <p>“The TEPP supports the U.S. DOE and other federal, state, tribal, and local...”</p> <p>Change “response” to “responding”.</p> <p>Change “material” to “materials”.</p>	<p>----- ----- Slide has been reworded.</p> <p>Comment not incorporated. Reference GPO rule 3.19</p> <p>Comment not incorporated.</p> <p>Comment incorporated.</p>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>Oregon Department of Energy</p> <p>----- ----- Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p><u>SLIDE NO. 34</u></p> <p>The level of detail regarding the TEPP program is probably too great for a general audience with a non-DOE presenter.</p> <p>Somewhat oversells the TEPP program. I don’t believe it has had that widespread of an influence – as of yet.</p> <p>----- ----- Slide title: Use TEPP since the acronym has been used on previous slides.</p> <p>2nd bullet: Incident – accident question.</p> <p>2nd bullet: change “material” to “materials”.</p>	<p>Comment incorporated.</p> <p>Slide has been restructured/reworded.</p> <p>----- ----- TEPP used.</p> <p>Refer to response to T-REX General Comment at the beginning of this matrix.</p> <p>Comment incorporated.</p>

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
<p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p><u>SLIDE NO. 35</u></p> <p>There are 8 regions, each with a label. Is each “label” equal? I.e., is each label a category, a city name, a state name, an area office? Labeling one group Idaho and one group Chicago seems odd to the lay person.</p> <p>Chicago and Albuquerque should be in black font, unless there is a legend distinguishing the two font colors from each other.</p> <p>Savannah River should be the same font size as all others.</p> <p>Insert space between Region 5 (6, 7, 8) and the contact name so it corresponds to Region 1-4 spacing.</p> <p>HQ – first usage in this presentation, so use Headquarters.</p>	<p>Comment incorporated.</p> <p>Believe it is obvious that font colors are to make region names clear against colored background.</p> <p>Comment incorporated.</p> <p>Comment incorporated.</p> <p>Comment incorporated.</p>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>----</p> <p>Transportation Resource Exchange Center (T-REX),</p>	<p><u>SLIDE NO. 36</u></p> <p>The level of detail regarding the TEPP program is probably too great for a general audience with a non-DOE presenter.</p> <p>-----</p> <p>-----</p> <p>Transition to this slide is murky. Is this part of TEPP? Is it a different program?</p>	<p>Comment not incorporated for this slide. Lists RAP points-of-contact.</p> <p>-----</p> <p>-----</p> <p>The slide explaining RAP program moved ahead of slide 36.</p>

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
University of New Mexico	<p>Change to: “U.S. DOE Radiological Assistance Regions (RAP)”.</p> <p>Add hyphen between “24” and “hour”.</p> <p>Omit hyphens between Office name and numbers, use colons.</p> <p>Align the phone numbers in a column.</p> <p>TEPP had a mission statement slide, should RAP have a mission statement slide?</p> <p>Is there a URL for RAP?</p> <p>Note: This slide should appear after slide #38.</p>	<p>Comment not incorporated.</p> <p>Comment incorporated.</p> <p>Comment incorporated.</p> <p>Comment incorporated.</p> <p>RAP slide rewritten.</p> <p>Information on RAP programs can be accessed through the TEPP site.</p> <p>Comment incorporated.</p>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>-----</p> <p>----</p> <p>U.S. Department of Energy,</p>	<p><u>SLIDE NO. 37</u></p> <p>The level of detail regarding the TEPP program is probably too great for a general audience with a non-DOE presenter.</p> <p>Capitalize “Web”.</p> <p>Add “http://” to be consistent with other URLs (or delete ALL http:// prefixes.</p> <p>-----</p> <p>-----</p> <p>Delete “Transportation Forum”.</p>	<p>Slide 37 was deleted.</p> <p>Slide deleted.</p> <p>-----</p> <p>-----</p> <p>Slide deleted.</p>

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
Office of Transportation	<u>SLIDE NO. 38</u>	
Council of State Governments Midwestern High-Level Radioactive Waste Committee	The level of detail regarding the TEPP program is probably too great for a general audience with a non-DOE presenter.	Slide rewritten.
----- -----	----- -----	----- -----
Transportation Resource Exchange Center (T-REX), University of New Mexico	Purpose/Mission: The TEPP slide says Mission; RAP says Purpose. Is this a correct wording?	Slide rewritten.
	Change “Provide radiological...” to “To provide radiological...”	Slide rewritten.
	Before both uses of DOE, add “U.S.”	Comment not incorporated.
	This slide and slide 36 need to be 36 and 37 respectively.	Slides were reordered.
	Change “State, Tribal, local and other Federal agencies...” to “state, tribal, and local agencies, as well as other federal agencies, in responding...”	Comment not incorporated. See GPO rule 3.19 about capitalization.
	Change “where” to “in which”.	Slide rewritten.
Transportation Resource Exchange Center (T-REX), University of New Mexico	1 st and second bullets: Spacing needs to be closer within bullet text lines.	Comment incorporated.

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
<p>-----</p> <p>-----</p> <p>U.S. Department of Energy, Naval Nuclear Propulsion Program</p>	<p>2nd bullet: This is the first usage of “your” (second person) in the presentation and seems awkward.</p> <p>-----</p> <p>-----</p> <p>Revise Purpose statement to read as follows: “Provide radiological control resources to assist DOE, State, Tribal, local and other Federal agencies in resolving emergencies or incidents involving radioactive materials where a concern for release of radioactive material or abnormal radiological condition exists.”</p> <p>Why? Clarification.</p>	<p>Slide rewritten.</p> <p>-----</p> <p>-----</p> <p>Comment partially incorporated. Slide was rewritten.</p>
<p>Council of State Governments Midwestern High-Level Radioactive Waste Committee</p> <p>-----</p> <p>-----</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p>	<p><u>SLIDE NO. 39</u></p> <p>The level of detail regarding the TEPP program is probably too great for a general audience with a non-DOE presenter.</p> <p>-----</p> <p>-----</p> <p>Change to: “The U.S. DOE”.</p> <p>1st dash: Leave a space between each period in the ellipsis.</p> <p>2nd dash: One space after the colon.</p> <p>2nd, 3rd, and 9th dashes: Insert “U.S” before “DOE.”</p>	<p>Comment not incorporated.</p> <p>-----</p> <p>-----</p> <p>Comment not incorporated.</p> <p>Comment incorporated.</p> <p>Comment incorporated.</p> <p>Comment not incorporated.</p>

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
Transportation Resource Exchange Center (T-REX), University of New Mexico	<p><u>SLIDE NO. 40</u></p> <p>Change to: “Information on U.S. DOE transportation...”</p> <p>Change website to Web site.</p> <p>Include a toll-free 800 number if available.</p>	<p>Slide deleted.</p> <p>Slide deleted.</p> <p>None available.</p>
Transportation Resource Exchange Center (T-REX), University of New Mexico	<p><u>SLIDE NO. 41</u></p> <p>Change “and DOE” to “and U.S. DOE”.</p> <p>Change (T-REX) to (T-REX).</p> <p>3rd bullet: Move Defense Programs’ URL under the name. On all URLs in this presentation: consistent use or non-use of the final slash needed.</p>	<p>Comment not incorporated.</p> <p>Comment incorporated.</p> <p>Bullet deleted from slide. End slashes added to URLs.</p>
Transportation Resource Exchange Center (T-REX), University of New Mexico	<p><u>SLIDE NO. 42</u></p> <p>3rd bullet: Move URL under Office of Science.</p> <p>Need consistent use of final slash in URL.</p>	<p>Slide deleted.</p> <p>Slide deleted.</p>
Council of State Governments Midwestern High-Level Radioactive	<p><u>SLIDE NO. 43</u></p> <p>With the exception perhaps of FEMA, these sites do not appear to be very useful. How about referring locals to state pages, or to the regional group pages? The information on</p>	<p>Comment partially incorporated.</p>

<i>Reviewing Organization</i>	<i>Comment</i>	<i>Response to Comment</i>
<p>Waste Committee</p> <p>Transportation Resource Exchange Center (T-REX), University of New Mexico</p> <p>-----</p> <p>----</p> <p>U.S. Department of Energy, Office of Transportation</p>	<p>radioactive materials transportation available through these sites would be more useful than, e.g., anything on the U.S. Postal Service site.</p> <p>Change “Federal agency sites include:” to “Federal agency Web sites include:”</p> <p>Use of dashes is inconsistent with pages 41 and 42. Dashes should appear after the name of the organization as on 41 and 42 (or, conversely, change the formatting on those two pages to correspond to this page).</p> <p>-----</p> <p>-----</p> <p>On Federal Agency sites – NRC and DOT are not provided – however, they were provided earlier. Should you repeat them here or refer back to previous slide?</p>	<p>Comment incorporated.</p> <p>Comment incorporated. Dashes changed to colons on these slides.</p> <p>-----</p> <p>-----</p> <p>NRC and DOT now listed here.</p>